

### Event Vetting

Government employees, particularly high-level officials like United States Attorneys, are subject to ethical restrictions governing the types of events they may attend. Some restrictions relate to benefits, including luncheons, dinners, awards, and tokens of appreciation they may accept. Other restrictions relate, among other things, to participation in events that are sponsored by persons who do business with or lobby the Government; that have a fundraising component; where it may appear that official attendance is being used to promote the event or the sponsor; or where elected officials may be in attendance. To assist us in vetting compliance with government ethical restrictions, we would appreciate it if you could provide the following information. If you do not have specific information for each response, please provide such general or descriptive information as you currently have. Please do not hesitate to call the Office's Government Ethics Advisor, (b)(6), (b)(7)c at (b)(6), (b)(7)c or e-mail him at (b)(6), (b)(7)c to discuss this.

1. Name, date and time, and location of event. Transparency International – USA Integrity Award Dinner. Target date of mid-late October or November 2016; 6.30 p.m. to 9.00 p.m. (Reception at 6.30 p.m.; Dinner and awards program 7.30 – 9.00 p.m.) The 2016 date will be set in coordination with the U.S. Attorney based on his calendar and venue availability, with a preference for the Capital Hilton, 1001 16<sup>th</sup> Street, N.W., Washington, D.C., site of the 2015 Integrity Award Dinner.

2. Format of event (*e.g.*, cocktails; presentations; speeches; and/or meal).

Dinner, including presentation of awards following dessert and coffee service. The U.S. Attorney will be asked to offer approximately 10 minutes of remarks upon his acceptance of the TI-USA Integrity Award. The U.S. Attorney is also invited to the cocktail reception with light hors d'oeuvres which precedes the Dinner and is open to all Dinner attendees.

3. Estimated cost per attendee of event. \$158 per person catering cost for reception and Dinner for those receiving complimentary invitations, based on 2015 Dinner catering costs. \$750 per person for those purchasing tickets.

4. Are any attendees being charged to attend the event?

- a. If so, who (in general) is being offered free attendance, and who is expected to pay? Free attendance is offered to invited employees / representatives of the U.S. government, non-profit organizations, embassies of other countries to the United States, labor, and multilateral development banks (*e.g.*, World Bank). Invited corporations, professional firms and individuals are expected to pay.

5. Name of entity extending the invitation and link to web site (if any). Transparency International – USA. [www.transparency-usa.org](http://www.transparency-usa.org)

6.

- a. Is the entity extending the invitation registered with the Secretary of the Senate and the Clerk of the House of Representatives as a lobbyist pursuant to Section 1603(a) of Title 2 of the United States Code? TI-USA is a 501(c)(3) organization and not a registered lobbyist.

7. Sponsor of event if different from above.

- a. Is the sponsor of the event registered with the Secretary of the Senate and the Clerk of the House of Representatives as a lobbyist pursuant to Section 1603(a) of Title 2 of the United States Code? N/A

8. Names of additional entities that will be recognized for sponsorship or support of the event. Invited U.S. corporations and professional services firms (e.g., law, accounting) who support the Dinner at or above the entry sponsorship level (\$7500 for a table of 10 seats) will be recognized as sponsors. We have not yet sought support for this year's Dinner so do not have names of sponsoring entities for this year's event. 21 corporations and professional services firms supported the 2015 Integrity Award Dinner as sponsors.

9. How many persons are expected to attend? Approximately 325 persons typically attend this annual Dinner. The ballroom at the Capital Hilton holds up to 450 persons. This is TI-USA's sixth Integrity Award Dinner.

10. Demographics of expected attendees (e.g., lawyers; law enforcement; business leaders; students; etc.) Lawyers; accountants; business leaders / corporate compliance officers; representatives of non-governmental organizations dedicated to combating corruption and increasing transparency; representatives of embassies of other countries to the United States (usually charge d'affairs or political or economic officers); career senior staff of U.S. government agencies and occasional political appointees; academics focused on anti-corruption. U.S. government departments and agencies with past attendance are principally: Departments of State, Justice and Commerce; SEC; USAID; National Security Council.

11. Are any elected officials expected to attend and, if so, what is their expected role? We have had two members of Congress attend a previous Dinner. Any members of Congress will be attending as dinner guests and will not have a role in the dinner program. No other elected officials are expected to attend.

12. Will there be any political activity at the event (i.e., any activity directed toward the success or failure of a political party, candidate for a partisan political office or partisan political group, for example, any speeches urging people to vote for or against a particular candidate or political party)? There will be no political activity. TI-USA is scrupulously non-partisan.
13. Is there a fundraising component to the event? (e.g., program advertisements; dinner ticket price; silent auction)? If so, please describe.<sup>1</sup> The Integrity Award Dinner is TI-USA's signature annual fundraising event. At the event, TI-USA recognizes those who have made significant contributions to the fight against corruption by the presentation of the TI-USA Integrity Award and TI-USA Corporate Leadership Award. Funds are raised through the dinner ticket price (\$750 per individual; \$7,500 starting sponsorship price). Sponsors are recognized in the Dinner program, with sponsors at the two highest levels (\$15,000, \$25,000) also being entitled to a program advertisement.
14. Expected role of U.S. Attorney (e.g., simple attendance; remarks; speech). In addition to attendance, the U.S. Attorney will be asked to offer approximately 10 minutes of remarks upon his acceptance of the TI-USA Integrity Award.
15. If the U.S. Attorney is being honored:
- a. What are the criteria your organization applies to determine who should be honored for this specific award? The TI-USA Integrity Award recognizes contributions by a U.S. based individual to the advancement of the fight against corruption and to the promotion of transparency and accountability within business, government and civil society. The recipient must have a reputation for integrity and a demonstrated and sustained track record of actions and ideas relating to the promotion and implementation of anti-corruption programs and/or the promotion of ethics and integrity.

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<sup>1</sup> For events that involve any fundraising leading up to or during the event: The United States Attorney may not participate in any active fundraising activity with respect to the event. Nor may the U.S. Attorney allow his name, position, or title to be used for any fundraising activity for your organization. If applicable, you may list his name as an awardee and/or speaker on the program and on invitations issued not more than 30 days prior to the event, along with other information about the program. He may not be listed on any "save the date" notices. Failure to comply with these limitations may preclude the U.S. Attorney from appearing at the event. If the U.S. Attorney is giving an official speech, he may be seated and have photos taken as appropriate for a speaker at the event, but you may not use his photo in connection with any other fundraising efforts.

- b. What is the internal process by which your organization selects potential honorees? Nominations are publicly solicited (e.g., website announcement, other social media invitation), with nominations submitted on a detailed template setting forth the basis for the nomination. A committee of TI-USA's Board of Directors reviews the written nominations and applies the criteria in 15a above in selecting potential honorees.
- c. For what specific public service or achievement do you wish to honor the U.S. Attorney? TI-USA wishes to honor Preet Bharara, the U.S. Attorney for the Southern District of New York, with the TI-USA Integrity Award for his commitment to prosecuting corruption and furthering integrity in the public and private (i.e., business) sectors.
- d. Did any of the accomplishments of the U.S. Attorney which you wish to honor directly affect the organization or its members? (Describe.) The accomplishments of the U.S. Attorney align with TI-USA's mission.
- e. Do any of the board members or host committee or senior staff have any matters pending before or involving the United States Attorney's Office for the Southern District of New York? We have identified that three individuals who are members of the 24 person Board of Directors of TI-USA have matters before or involving the U.S. Attorney's Office for the Southern District of New York as part of their law practice.
- f. Please provide a description and the value of any award item (if the award item is a plaque, certificate or trophy of little intrinsic value, you may so indicate). Trophy of little intrinsic value – see 16.a. for details.
- g. Who else is expected to be honored at the event? TI-USA also presents the Corporate Leadership Award at this annual event. This year's corporate honoree will be confirmed shortly. Previous recipients of the Corporate Leadership Award are PepsiCo, Raytheon, Fluor, Coca-Cola and GE. TI-USA may present two Integrity Awards in 2016, with exploratory discussions underway with representatives of Howard Schultz, CEO of Starbucks, for Schultz's leadership in business ethics, building a corporation with a commitment to community service and respect for the individual, and advocacy of the importance of strong corporate social responsibility. (In this case, one Integrity Award would go to the U.S. Attorney and a separate Integrity Award to Mr. Schultz). TI-USA also is conducting a student essay contest on combating corruption for students at the undergraduate and graduate level, and expects to recognize the student judged to have written the best essay.

16. If the U.S. Attorney is making a presentation, who else is expected to be making a presentation/be on a panel? The designated representative of the company receiving the Corporate Leadership Award and Mr. Schultz will also each be asked to provide remarks of 8 minutes upon receiving their respective awards. Each award is presented individually.
- a. Will the U.S. Attorney be presented with a token or memento in appreciation for his presentation?
    - i. ☐ Nothing
    - ii. ☒ Plaque or other memento of little intrinsic value (in this case, engraved glass trophy of little intrinsic value. For the 2015 Integrity Award, the cost to TI-USA of the trophy, including engraving and shipping to TI-USA, was \$355. )
    - iii. ☐ Other. Please describe, including its value.
17. Describe any special seating arrangements for U.S. Attorney, *e.g.*, dais, general seating (depending on the nature of the event, the U.S. Attorney may or may not be able to accept “dais” seating.) We would like to seat the U.S. Attorney at the so-called “head table” on the general floor of the event. The ten person table would include the Chair of the Board of Directors of TI-USA, the President of TI-USA (a direct hire staff position), a representative of the recipient of the Corporate Leadership Award and Mr. Schultz (subject to his award acceptance). Alan Larson, the Chair of the Board of Directors of TI-USA, has advised that he has no matters before or involving the U.S. Attorney’s Office for the SDNY.
18. Promotion of the event: please provide a copy of or link to the invitation/promotional material for the event (or if not available, for the prior year’s event). A copy of the invitation for last year’s event is attached. We understand the limitations on the U.S. Attorney and the use of his name for fundraising events set forth in note 1 of this form.